



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

April 28, 2025

**BY ECF**

The Honorable Arun Subramanian  
United States District Judge  
500 Pearl Street, Courtroom 15A  
New York, New York 10007

Re: *Khalil, et al. v. The Trustees of Columbia University in the City of New York, et al.*, 25 Civ. 2079 (AS)

Dear Judge Subramanian:

This Office represents Pamela Bondi, in her official capacity as United States Attorney General; Linda McMahon, in her official capacity as Secretary of the United States Department of Education; Leo Terrell, in his official capacity as the head of the Department of Justice Taskforce to Combat Anti-Semitism; Sean Keveney, in his official capacity as Acting General Counsel for the United States Department of Health and Human Services; and Josh Gruenbaum, in his official capacity as the Federal Acquisition Service Commissioner of the General Services Administration (together, the “Executive Branch Defendants”). We write respectfully to request both an extension of time to respond to Plaintiffs’ Second Amended Complaint and additional pages to do so.

With respect to the requested extension of time, the Executive Branch Defendants respectfully request a three-week extension of time, from May 2, 2025 until May 23, 2025, to respond to Plaintiffs’ Second Amended Complaint. *See* ECF No. 54. If the Court grants the request, Plaintiffs’ reply brief would be due on June 6, 2025. *See* Local Civil Rule 6.1.

The Executive Branch Defendants require the additional time to properly respond to Plaintiffs’ Second Amended Complaint, which adds a new claim alleging violation of the Administrative Procedure Act against the Executive Branch Defendants. Counsel is in the process of conferring with the client agencies and requires additional time to do so. Further, the complex issues involved in this litigation require coordination among multiple components of the federal government, which we need additional time to accomplish. Notably, the Executive Branch Defendants were first served in this action on March 24, 2025, so a three-week extension would align the response date with the 60 days provided to the United States and its officers and/or employees under Fed. R. Civ. P. 12(a)(2) for responding to complaints. This is the Executive Branch Defendants’ first request for an extension of time.

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With respect to the requested page enlargement, the Executive Branch Defendants respectfully request 30 pages for their memorandum of law in support of their motion to dismiss. This page enlargement is necessary to properly respond to the Second Amended Complaint.

Counsel for the U.S. House of Representatives Committee on Education and Workforce and Tim Walberg consent to these requests. Counsel for Columbia University, its Trustees, and Claire Shipman do not oppose these requests if all Defendants remain on the same briefing schedule. Counsel for Plaintiffs have asked us to note that “Plaintiffs take no position on a short extension consistent with the urgency of this suit.”

We thank the Court for its consideration of these requests.

Respectfully submitted,

JAY CLAYTON

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cc: Counsel of Record (by ECF)